

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 2:23-cv-00641-JRG-RSP

JURY TRIAL DEMANDED

**PLAINTIFF HEADWATER RESEARCH LLC'S
UNOPPOSED MOTION TO EXTEND RESPONSE DEADLINE**

Plaintiff Headwater Research, LLC (“Headwater”) respectfully requests to extend the deadline to respond to Defendants Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc.’s (“Samsung”) Motion For Sanctions Under Fed. R. Civ. P. 37(E)(1) (Dkt. 59) (the “Motion”) by six days.

The Motion was filed on January 28, 2025 and served at 5:02 p.m. Central Time. Headwater’s response to the Motion is due on February 12, 2025. See Local CV-7(e). Headwater seeks a six-day extension to its deadline to respond to the Motion, which would move the deadline from February 12, 2025 to February 18, 2025.

Defendants do not oppose this request. The requested extension is not sought for the purpose of delay and will not require extension of any other deadlines. Good cause also supports granting Headwater’s request, which would allow Headwater sufficient time to address the issues raised in Samsung’s Motion.

Dated: February 10, 2025

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*Attorneys for Plaintiff**Headwater Research LLC*

CERTIFICATE OF SERVICE

I certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/ Marc Fenster
Marc Fenster
Attorney for Plaintiff
Headwater Research LLC

CERTIFICATE OF CONFERENCE

I certify that that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties agree on filing this joint statement.

/s/ Marc Fenster
Marc Fenster
Attorney for Plaintiff
Headwater Research LLC